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June 10, 2019

**BY ECF**

The Honorable Joseph A. Dickson  
United States Magistrate Judge  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 2D  
Newark, New Jersey 07101

Re: *Kyle-Labelle v. Selective Service System et al.*, Docket No. 2:15-cv-05193-ES-JAD  
(D.N.J.)

Dear Judge Dickson,

We write in response to the Court's April 30, 2019 order, which required the parties to "submit a joint letter updating the Court on the status of discovery by June 10, 2019." ECF No. 99. The parties jointly submit the following:

On May 2, 2019, defendants served a first set of interrogatories on plaintiff. Under Federal Rule of Civil Procedure 33, plaintiff's responses to those interrogatories were due by June 3, 2019. However, in advance of the June 3, 2019 deadline, plaintiff informed defendants that she was in the process of retaining new counsel, and asked for a three-week extension of time to respond to the interrogatories. Defendants agreed to extend plaintiff's response deadline by three weeks to June 24, 2019. Plaintiff expects that her new counsel will substitute in for current counsel the week of June 10, 2019.

In light of plaintiff's change in counsel and defendants' agreement to a three-week extension of time for plaintiff to respond to the first set of interrogatories, the parties respectfully request that the Court similarly extend all current deadlines by three weeks. Accordingly, the parties propose the following new schedule:

- July 19, 2019: Deadline for defendants to serve and conduct discovery related to class certification;
- August 9, 2019: Deadline for defendants to serve, but not file, any opposition to plaintiff's motion for class certification;
- August 23, 2019: Deadline for plaintiff to serve, but not file, any reply to defendant's opposition to the motion for class certification;

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August 27, 2019: Deadline for the parties to electronically file all motion papers simultaneously.

The parties have not previously requested extensions of the above deadlines.

Respectfully submitted,

By: /s/ Matthew Skurnik  
MATTHEW SKURNIK

/s/ Michael Daher  
MICHAEL DAHER